

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN**

MEDWEST ASSOCIATES, INC. an Illinois corporation,) Case No. 1:18-CV-00966
Plaintiff,) Hon. Janet T. Neff
v.)
ERIC WAGNER, an individual,)
Defendant.)

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO PLAINTIFF'S
VERIFIED COMPLAINT FOR INJUNCTIVE RELIEF**

COMES NOW Eric Wagner (“Wagner”), by and through counsel, and with a full reservation of rights, respectfully submits the following unopposed Motion to for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Verified Complaint for Injunctive Relief (the “Complaint”), up through and including October 12, 2018.

Wagner requests an extension of time within which to file a responsive pleading through and including October 12, 2018, in order to allow the parties additional time to continue discussions related to resolution of this matter without the need for further litigation. Wagner states no prejudice will result to any party should the requested extension be granted. No additional deadlines will be affected by the requested extension.

Pursuant to Local Rule 7.1, Defendant sought concurrence in the relief sought from Plaintiff. During a conference between attorneys, Defendant's counsel explained the nature of its motion. Plaintiff has indicated there is no opposition to this extension.

WHEREFORE, Wagner respectfully request that the Court grant this Motion and moves this Court for an Order allowing Wagner to answer, respond, or otherwise plead to Plaintiff's Verified Complaint up to and including October 12, 2018.

Respectfully submitted this 9th day of October, 2018.

Respectfully submitted,

By: /s/ Raechel T. X. Conyers
HONIGMAN MILLER SCHWARTZ AND COHN LLP
Raechel Conyers (P80156)
2290 First National Building
660 Woodward Avenue
Detroit, Michigan 48226-3506
(313) 465-7000
rconyers@honigman.com

Attorney for Defendant Eric Wagner.

and

BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ, PC

Whitney M. Harmon (pro hac vice admission forthcoming)
165 Madison Ave, Suite 2000
Memphis, Tennessee 38103
(901) 577.8202
wharmon@bakerdonelson.com

Attorney for Defendant Eric Wagner.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of October, 2018, I caused a true and correct copy of the foregoing document to be filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system, which will send notification of such filing to all counsel of record.

By: /s/ Raechel T.X. Conyers
Raechel T.X. Conyers